

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

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UNITED STATES OF AMERICA

:

:
- v. -

:
SUPERSEDING
INFORMATION

STEVEN BROWN,

:

Defendant.

:

S9 16 Cr. 436 (KMW)
USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: APR 05 2018

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COUNT ONE

(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. From at least in or about 2009, up to and including in or about 2017, in the Southern District of New York and elsewhere, STEVEN BROWN, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that STEVEN BROWN, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings,

signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, BROWN, and others used interstate phone calls and emails, among other means, to solicit funds from investors, including nine individual victims ("Victim-1" through "Victim-9"), based on misrepresentations regarding purported guaranteed returns and profits, the amount of funding BROWN, his co-conspirators, and other investors had already contributed to the film projects, and how the solicited funds were going to be used, among other misrepresentations.

(Title 18, United States Code, Sections 1349.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Information, STEVEN BROWN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, which constitutes and is derived from proceeds traceable to the offense alleged in Count One, including but not limited to a sum

of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSETS

4. If any of the above-described forfeitable property, as a result of any act or omission of STEVEN BROWN, the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


Geoffrey S. Berman
GEOFFREY S. BERMAN T#
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. § 1349.)

GEOFFREY S. BERMAN
United States Attorney.

4/5/18 - Filed Superseding Indictment.
OC
Waiver of Indictment filed

J. Dotman
USMA